



Counseling and Advising Clients Exclusively on Laws of the Workplace

Zabell & Associates, P.C.
One Corporate Drive, Suite 103
Bohemia, New York 11716
Tel. 631-589-7242
Fax. 631-563-7475
www.laborlawsny.com

Saul D. Zabell
Email: szabell@laborlawsny.com

February 2, 2017

VIA ELECTRONIC CASE FILING

The Honorable Robert M. Levy
United States Magistrate Judge
United States District Court – EDNY
225 Cadman Plaza East
Brooklyn NY, 11201

Re: Valdez-Mendoza v. Jovani Fashion Ltd., et al.
Case No.: 15-cv-07261 (ILG) (RML)

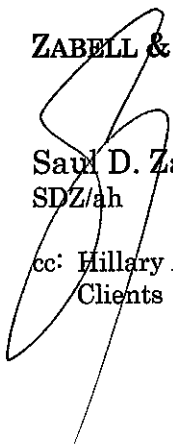
Your Honor:

This firm is counsel to Roberto Valdez-Mendoza and Ramon E. Valdez-Mendoza, Plaintiffs in the above-referenced matter. We write to respectfully advise the court that after the last conference and review of documentation produced by Defendants, we do not believe further settlement discussions will be fruitful. Consequently, we respectfully request permission to proceed with fact discovery.

Counsel remains available should Your Honor require additional information regarding this application.

Respectfully submitted,

ZABELL & ASSOCIATES, P.C.



Saul D. Zabell
SDZ/ah

cc: Hillary Ann Fraenkel, Esq. (via Electronic Case Filing)
Clients